



**INDEPENDENT COMMUNITY  
BANKERS of AMERICA**

March 8, 2006

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*President and CEO*

Office of the Comptroller of the Currency  
250 E Street, SW  
Mail Stop 1-5  
Washington, DC 20219  
Re: Docket Number 06-1

Robert E. Feldman  
Executive Secretary,  
Attention: Comments, FDIC  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Jennifer J. Johnson, Secretary  
Board of Governors of the  
Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20551  
Re: Docket No. OP-1248

Regulation Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, NW  
Washington, DC 20552  
Attention: No. 2006-01

Re: Proposed Guidance Regarding Concentrations in Commercial Real Estate Lending, Sound Risk Management Practices

Dear Sir or Madam:

The Independent Community Bankers of America appreciates the opportunity to offer comments on the proposal by the Office of the Comptroller of the Currency, Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, and the Office of Thrift Supervision on the proposed guidance entitled, *Concentrations in Commercial Real Estate Lending, Sound Risk Management Practices*.

The ICBA plans to file comments on the proposed guidance but we respectfully request that the Agencies extend the comment period for an additional thirty days beyond the current deadline of March 14, 2005.

In the recent days, it has become clear to ICBA that community bankers need additional time to analyze the proposal and determine how it would affect their current lending policies, risk management practices and capital levels and prepare comments on the proposal. Clearly, many community banks are likely to be considered to have concentrations in commercial real estate lending practices based on the proposal's thresholds and it is imperative that they have sufficient time to analyze and comment on the proposal.

We appreciate your consideration of the requested 30-day extension. We encourage you to reach a decision quickly.

Sincerely,

Karen M. Thomas  
Executive Vice President  
Director, Government Relations Group